

EXHIBIT A

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

U.S. COMMODITY FUTURES TRADING)	Case No.: 05-CV-02641 JSW
COMMISSION and THE COMMISSIONER)	
OF CORPORATIONS OF THE STATE OF)	PLAN FOR DISTRIBUTION OF FUNDS
CALIFORNIA,)	
)	Date: October 22, 2010
Plaintiffs,)	Time: 9:00 a.m.
)	Place: Courtroom 11, 19 th Floor
vs.)	United States District Court
)	Northern District of California
NATIONAL INVESTMENT)	450 Golden Gate Avenue
CONSULTANTS, INC., a California)	San Francisco, CA 94102
corporation, SOUTH CHINA)	
INVESTMENTS, INC., a California)	
corporation,)	Assigned to Hon. Jeffrey S. White
PACIFIC BEST GROUP LTD, a.k.a.)	

1 PACIFIC BEST COMPANY LTD, a British)
 2 Virgin Islands Corporation, YI KERRY XU,)
 3 an individual, RUN PING ZHOU a.k.a)
 4 FLORA ZHOU, an individual, and WEI M.)
 5 TSE a.k.a. RAYMOND TSE, an individual,)
 6 Defendants,)
 7 and)
 8 THERESA C. WONG, an individual,)
 9 Relief Defendant.)
 10 _____)

11 I. Introduction

12 The Consent Order entered on September 1, 2006 in this action, case number 05-2641
 13 JSW, provided that the defendants make restitution payments to the settlement monitor Daniel
 14 Driscoll of the National Futures Association ("NFA") for distribution to defendants' customers.
 15 The Consent Order also directed the settlement monitor to collect funds from banks holding
 16 frozen funds pursuant to the June 29, 2005 restraining order to be distributed as restitution as
 17 well.

18 Defendants made no restitution payments and as a result a stipulated judgment in the
 19 amount of \$3,400,000 was entered on December 19, 2006. At this time the only funds available
 20 for distribution are those from defendants' bank accounts, currently being held by the monitor the
 21 NFA, totaling \$272,496.95. Plaintiffs, through the settlement monitor the NFA, intend to
 22 distribute these funds on a pro rata basis to investor claimants who have provided supporting
 23 documents as shown in the Investor Claimant List and Distribution Schedule, both of which are
 24 attached hereto.

25 II. The Investor Claimants who will Receive Distribution Funds

26 Investor claimants (that is, those persons who claim to have invested money with one or
 27 more of the defendants to be used for currency trading) were identified in this case when they, or
 28 someone on their behalf, initiated an oral or written complaint to the CFTC or California
 Department of Corporations. The first complaints pre-dated the filing of this civil action; a

1 number of complaints followed the filing of the Complaint; many complaints followed the
2 settlement of this case and filing of the Consent Order; and the last complaints were received in
3 February 2008. The name and last known address of each investor claimant is listed in the
4 attached Investor Claimant List. (Note: The Plaintiffs have tried to list each claimant by first
5 name first, but the settlement monitor may discover at the time of distribution that a name needs
6 to be corrected. In addition, where the Investor Claimant List has names in the disjunctive {eg.
7 "or"} it is the Plaintiffs understanding that persons listed are somehow related, such as father or
8 son, husband or wife, and the distribution check can be made payable to either claimant.)

9 In addition to providing identifying information, each investor claimant was asked to
10 provide the dates and total amount of funds invested, the amount of funds lost, and written
11 support of their claims. All but seven investor claimants provided supporting documents. The
12 attached Investor Claimant List provides in adjacent columns from left to right: the identity of
13 each investor claimant, the amount and date of the investment, and the amount of loss claimed if
14 supporting documents were provided. If no supporting documents were provided there is no
15 monetary amount listed under the column "Amount Lost". Each investor's pro-rata share of
16 available funds is provided in the Distribution Schedule attached as well.

17 In this distribution plan there is no difference in the treatment of investors due to the date
18 they invested. Victims are included in the distribution list who lost investments beginning in
19 June 2001 with South China Investment, beginning in around February 2004 with NICI, and up
20 through November 2007 with Christ Investment Service, Inc. All three companies perpetuated
21 the same foreign currency trading fraud, were managed and controlled by the same individual
22 defendants (including Flora Zhou and/or Raymond Tse), and at one time or another operated out
23 of offices located in 300 Montgomery Street, San Francisco, CA. Shortly after the filing of this
24 civil action defendant Raymond Tse moved Christ Investment to 900 Kearny Street #228, San
25 Francisco, CA, and continued perpetuating this scam until late 2007 when according to the
26 Plaintiffs' information he left the country.

27 In addition, in this distribution plan there is no distinction made between Account
28

1 Executives who invested and others who invested. The defendants perpetuated this currency
2 trading scam by employing Account Executives and getting them to invest their own money, or
3 recruit their relatives, friends or other persons to invest. All were victims of defendants' fraud.
4 However, no Account Executive is included in the distribution plan who is considered to have
5 been substantially involved in the fraud.

6 **III. Distribution of Funds**

7 According to this plan of distribution, that is subject to approval by this Court, a pro rata
8 distribution of the available funds will be made to all known investor claimants of this scam who
9 have provided documents supporting their claimed loss, as shown in the Investor Claimant List
10 and Distribution Schedule, both of which are attached hereto.

11 Any amounts returned by a defendant to an investor claimant have not been included in
12 the amount of loss claimed.

13 All known investor claimants are listed in the attached Investor Claimant List, and the
14 only known investor claimants who will not be included in the distribution of funds, as reflected
15 in the attached Distribution Schedule, are those who have not provided supporting documents. A
16 pro rata distribution will treat all investor claimants who have provided supporting documents
17 equally.

18 The total amount of documented investment loss is \$3,072,784.74 and the total the NFA
19 has available for distribution is \$272,496.95. The pro rata amount for each investor was
20 determined by dividing that claimant's amount of proven loss by the total investment losses
21 multiplied by the total available funds for distribution. An individual investor claimant's share
22 of the pro rata distribution appears in the distribution schedule attached.

23 **IV. Procedures for Objection to Plan**

24 Receiving copies of the Motion and Plan of Distribution (including attached Investor
25 Claimant List and Distribution Schedule) provides victims the opportunity to object to any
26 portion of the Plan by filing a memorandum in opposition to this Motion with this Court. Copies
27 of this Motion, and Plan of Distribution (including Investor Claimant List and Distribution
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1 Schedule), and the Declarations of Suzanne Cech and Peter Mock, have been mailed,
2 contemporaneously with the filing of this motion, to each investor claimant's last known address
3 as reflected in the proof of mailing attached as Exhibit B to plaintiffs' Motion.

4 Any person opposing this Motion and Plan of Distribution (including attached Investor
5 Claimant List and Distribution Schedule) shall file a written memorandum of opposition with the
6 Court, mail the memorandum to the Plaintiffs (see addresses for Plaintiffs on top of first page of
7 this Plan), and comply with Local Rules, no later than October 1, 2010. Failure to timely file an
8 opposition may be deemed by the Court to be consent to the granting of this Motion.

9 Responses to oppositions or objections to the Plan are to be filed with the Court no later
10 than October 8, 2010.

11 Upon conclusion of the period allowed for oppositions and responses and within 30 days
12 after the entry of the Approval Order, the NFA shall distribute the funds to eligible claimants
13 pursuant to the terms of the approved plan.

14 **V. Miscellaneous Provisions**

15 The NFA shall be authorized, empowered and permitted to enter into an agreement or
16 agreements with any investor claimant subsequent to the Approval Order, which provide(s) for
17 payment or treatment of such claimant's claim; provided, however, that no such agreement or
18 agreements shall provide for payment or treatment of such claimant's claim upon terms more
19 favorable to such claimant than the payment or treatment provided to other claimants.

20 The provisions of the Plan upon confirmation through the Approval Order, shall be
21 binding upon all claimants and parties in interest.

22 Where applicable distributions under the Plan shall be made by sending a check in the
23 name of the claimant to the last known address of said claimant or to the address specified by any
24 change of address notices received by the NFA before the funds are distributed. Investor
25 claimants are required to advise the NFA, in writing, of any change of address.

26 In the event that an approved investor claimant fails to negotiate a check within 90 days
27 after the date of the check such claim shall be considered abandoned and disallowed in its
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entirety. The funds, which would otherwise be distributed to such claimant, shall be distributed to Plaintiffs as payment of defendants' penalties.

The NFA shall be held harmless for any damages or liability that may arise through the discharge of its duties under the Plan.

There is a possibility that additional sums will be collected in the future by the Treasury Department. If more funds become available for further distributions, the NFA shall distribute these funds in accordance to the terms of this Plan, Investor Claimant List and Distribution Schedule, but the Plan, List and Schedule may be modified both before and after approval, on such notice and hearing as this Court deems appropriate.

The Court shall retain jurisdiction over the Case for all purposes allowed by law including, but not limited to, the following:

- a.) the interpretation, implementation, enforcement, and consummation of the Plan;
- b.) the allowance or disallowance of any claim;
- c.) the determination of the validity and priority of any claim;
- d.) the modification of the plan as may be necessary to carry out its intent; and
- e.) any future plans of partial or final distribution.

The plaintiffs believe the Plan represents a fair and equitable plan of distribution of the minimal funds available. It is respectfully requested that this Court approve the plan of distribution.

Dated: July 16, 2010

Respectfully submitted,

_____/s/_____(by Edward K. Shinnick with Permission of Kevin Batteh)
 Kevin K. Batteh
 Chief Trial Attorney
 James H. Holl, III
 Chief Trial Attorney
 Attorneys for Plaintiff U.S. Commodity
 Futures Trading Commission

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Preston DuFauchard
California Corporations Commissioner
Alan S. Weinger
Deputy Commissioner
Edward Kelly Shinnick
Corporations Counsel
Attorneys for Plaintiff Commissioner of
Corporations of the State of California

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Ling, Shi Jing (needs chinese translator)	415-846-2677		107 Jules Ave., San Francisco, CA 94112	Inv. 20K initially but was losing so inv 40K total and 8K rec	\$32,000.00	8/04 to 11/04	Account Exec.
Huang, David (Zhao Chang Huang)	415/713-6484	650-341-8838	207 San Benito Road Brisbane, CA 94005	Inv. 23K and rec only \$99 when closed	\$22,901.00	7/02 to 11/02	Account Exec; Used anothers name to open the account.
Ragos, Renne	510-841-9304	510-693-6257	2703 Matthews Street, Berkeley, CA 94702	\$75K inv. lost it all	\$74,430.00	fall 2004	Declaration signed. \$570 cash back
Li, Yuling (needs translator)	650-572-8568 or c. 650/504-7173	650-504-7173	1091 Shell Blvd., Apt 9, Foster City, CA 94404	\$10K initially and then another \$3,597 to save acct. Closed acct w/ 3K left. (Also she opened up accts for unnamed others who lost \$)	\$10,597.00	5/03 to 7/03	Acct Exec
FEI, GUO QIANG (needs translator)	415/386-7345	Broker Ann Huang at fax #650-802-8298	4122 Balboa St., SF, CA 94121	Lost 24K verified (closed acct with 2,374)	\$24,000.00	8/04 to 11/04	This is Vincent Feng's father. Vincent's English is bad; On 6-21-06 a friend and a broker Ann Huang called for Guo Feng and asked me status. I sent her a Questionnaire and she returned an excited one with receipts in June 2006. A/C#F8361.
Wan Jun Zhao (needs translator)	415-586-0242	650-344-5500	835 Airport Blvd., Burlingame, CA 94010	Lost \$50,000	\$50,000.00	9/04 to 11/04	Husband Rong Wei Wang was Acct Exec and invested Wan Zhao's money in an acct in her name; After this she divorced him and he returned to China and she is left w/ children.
Benjamin Bao Shan Yan (needs translator)	415-337-7956	415-882-1688	621 Bowdoin Street, S.F. CA 94134	\$10,500 lost it all	\$10,500.00	8/02 to 2/03	Acct Exec.
Xiao Yuan Guo (Wei Tag) (needs translator)	415-931-6768	415-203-2830	937 Clay Street, #204, SF, CA 94108	Initially 20K invested but then \$61,050 to keep it losing acct; all lost	\$61,050.00	6/03 to 10/03	Acct Exec
Huang, Lin (Husb Withon Zi Chang Wu) needs translator	415-516-1936		654 Jackson Street, Apt 1, SF, CA 94133	\$20,000	\$20,000.00	8/03 to 9/03	Acct Exec. Tse interv. Acct in husb name
Wang, Xiang	415-731-4485	415-374-0077	2238 42nd Ave, SF, CA 94116	20K; closed acct w \$1,200	\$18,800.00	1/04 to 3/04	Declaration signed. Speaks poor English.
Chen, Nan Hui	415/674-8116		627 Taylor Street, #14, San Francisco, CA 94102	\$20K	\$20,000.00	1/02 to 5/02	Declaration signed.
Zhao, Jian	415-602-9617		1634 43rd Ave. SF, CA 94122	\$20K	\$0.00	1/05 to 3/05	Husband invested. Aml. From complaint form. See husband's claim
Mei, Wenzhen	415-333-4394	415-812-8457	36 Naglee Ave. SF, CA 94112	\$33,700	\$25,300.00	11/04 to 7/05	Acct Exec.
Zhu, Zhi Yuan	415-585-5652	415-819-0896	128 Newton Street, SF, CA 94112	\$42K lost	\$42,000.00	8/04 to 12/04	Declaration signed. Acct Exec.

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Lee, Derrick (needs translator)	415/933-9010		343 22nd Ave Apt 2 San Francisco, CA 94121	\$70K lost		Around 2003	Investor did not maintain any documents. He tried to obtain check copies from the bank but not successful
Duan, Nicolas	415-552-2268	415-489-8997	1180 Howard Street, Apt 415, SF, CA 94103	\$70,467	\$70,467.00	2/04 to 7/04	Declaration signed.
Luo, Hua Jie (needs translator)	650-997-3310	510/589-6008	383 Chester Ave. SF, CA 94132	\$60K, \$56K document. Withdrew \$4K	\$56,000.00	5/03 to 7/03	Acct Exec. A/C#F8235.
Huang, Jeff Zhuofan (needs translator)	415-822-2381		1313 Quesada Ave. SF, CA 94124	\$40K	\$40,000.00	1/02 to 5/02	Contacted by Wen Ling (Acct Ex)
Huang, Su Ling	650-991-7187	415-657-0419	824 Maddux Dr Daly City, CA 94015	\$20K	\$20,000.00	5/04 to 7/04	Xing Yao Liu was my Acct Exec.
Chen David Chaowei (needs translator)	510-278-5782	510-406-3832	545 Cornell Street, San Lorenzo, CA 94580	\$37,000	\$37,000.00	10/04 to 4/05	Ying Wang (Acct Exec)
Sun, Xindong (needs translator)	415-548-3088		431 Richmond Dr. Apt 7 Millbrae, CA 94030	\$30K, \$1K cash back	\$29,000.00	4/00 to 4/01	Invested with Flora Zhou
Zhao Lian Jian	415/621-4606	415/812-7016	1462 Quesada Ave. SF, CA 94124	\$60K	\$53,081.00	12/01 to present	A/C#F8163.
LaBing Loo (needs translator)		415/986-4943	1104 Stockton Street, Apt 104, SF, CA 94133	Deposited \$20K but lost \$14K and had trouble getting back balance	\$14,395.03	9/03 to 9/04	Her Son, Allen (Haixin) Huang was hired as an Acct Exec. Opened an acct in my name
Xiao Ping Hu (and mother Ying Hu) (needs translator)	415/752-5036	415/812-2280	491 31st Ave #219, SF, CA 94121	My son and I lost \$24K net	\$24,000.00	9/04 to 11/04	Invested with son
Xieji Feng	650/697-7266	650/271-2743	362 Richmond Dr #6, Millbrae, CA 94030	\$28K, Withdrew \$8K	\$20,000.00	9/03 to 10/03	Acct Exec. A/C#F8257.
Wang Si Kou	650/697-8938	650/740-6539	1086 Clearfield Drive, Millbrae, CA 94030	\$25K, withdrew \$87.31	\$24,912.69	7/03 to 8/03	Friend Eva Choi was an Acct Exec. A/C#F8223.
Kobayashi W. Shinu	209/537-7576	209/204-7713, unable to contact	1229 Riverette Dr. Modesto, CA 95351	Unknown		7/05 to 8/05	Invested w Raymond Tse
Wu Ouyang	415/585-7876	415/359-8513	470 Olsego Ave. San Francisco, CA 94112	\$17K	\$17,000.00	10/03 to 11/03	A/C#8263
Julie Qinglian Zhang	415-240-9246 cell		15 Ponceta Dr. #237, Daly City, CA 94015	\$60,490.49	\$60,490.49	1/3/2003	A/C#F8208
Carol E. Gill	510/568-9417	888-434-9391	4096 Piedmont Ave. #347 Oakland, CA 94611	\$20,000.00	\$18,015.41	1/03 to 3/03	Withdrew \$1,984.59 on 5/6/2003
Cindy Liu Zheng	510/835-2693	510/604-0038	1534 Third Ave. Oakland, CA 94606	\$25K withdrew \$7K	\$18,000.00	6/04 to 6/05	May have been an Acct Exec. A/C#F8370.

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Jin Honk Zhao	415/467-8328	415/771-1405	93 Wabash Terrace, San Francisco, CA 94134	\$23K	\$23,000.00	3/05 to 6/05	A/C#F8411
Shao Fu Guan	415/664-8605	415/513-2309	1459 46th Ave. SF, CA 94122	\$12K. A/C#F8103	\$9,616.00	7/20/2001	My son Xing Hua Guan was an Acet Exec.
Jian Ning Cao	415/664-5185		1234 Sixth Ave. Apt 4, SF, CA 94122	\$34,500, withdrew \$8,333.27	\$26,166.73	9/03 to 10/03	Acet Exec. More info and docs available upon request. A/C#8259.
Yvonne Huang (needs translator)	510/261-4322	510/703-1115	2127 East 21st St. Oakland, CA 94606	\$20K?? Or \$68,000??		8/02 to 10/02	Huang was an Acet Ex w/ 2 clients, Danny Choi and UK second person.
Danny Choi			1201 53rd Ave., Oakland, CA 94601	\$20K?		Aug-02	Choi invested thru Acet Ex. Yvonne Huang and she has indicated that the total she and her two clients lost (one of which was Choi) was \$68K. A/C#F8176
David Laursen		925/876-6641	4298 Oleander St., Livermore CA 94551	\$105K. \$4K withdrawal	\$101,000.00	5/04 to 7/05	Declaration signed
Sophia Sun (needs translator) and David Jiang (needs translator)	Cell: 415/290-6381	415/731-6361	1805 Diamond Street, SF, CA 94131	\$40K	\$40,000.00	6/04 to 8/04	Her Acet Exec was her husband David Jiang (Yun Long).
Kitty Chang (poor English)	414/468-3228		1228 Goettingen Street, SF, CA 94134	Lost \$15,501. Had invested \$20K but w/d some cash.	\$15,501.00	6/17/2004	Kitty Chang invested thru her friend's husband Acet Exec. David Jiang. We have copies of her Deposit Receipt and one Daily Stmt. Is friends w/ S. Sun.
Helena Yeehar Lee (poor English)	415/203-9851		1884 17th Ave. SF, CA 94122	\$20K	\$20,000.00	6/18/2004	Helena Lee was another friend who invested thru Acet Ex David Jiang. We have a copy of her cancelled check to "SCI" only. Housewife.
Sarahs Rehmk	510/657-1052		4818 Claremont Park, Fremont, CA 94538	\$13K	\$13,000.00	5/04 to 7/05	Julie Zhang was Acet Exec
Sylvia Obradovic	510/436-4348		2036 13th Ave. Apt.3, Oakland, CA 94606	30K	\$30,000.00	10/04 to 11/04	Declaration signed.
Steven Ting	650/307-1313	650/522-9990	1658 Palm Ave. San Mateo, CA 94402	\$19,500	\$19,500.00	3/04 to 11/04	Declaration signed.
Houayu Christina Liang	Cell: 510/499-2328		901 Balra Dr., El Cerrito, CA 94530	28K	\$28,000.00	9/04 to 12/04	Declaration signed.
Tszio Lui (Danny)	Cell: 415/254-9949		2423 42nd Street, SF, CA 94116	20K	\$15,500.00	10/04 to 11/04	Declaration signed. A/C#F8378. A/C# F8226.
Mei Jin Sheng	415-661-6662	408-717-8035	2709 Irving Street, SF CA 94122	20K	\$20,000.00	10/20/2004	Told no risk
Larry Chang	415-602-0342		904 South Gate Ave. Daly City, CA 94015	90374.98	\$90,374.98	Jan-06	Declaration signed.
Leone Lau	650-992-8587	415-378-4783	8200 Oceanview Ter #423 SF 94132	100K	\$100,000.00	Mar-06	A/C#F8483
Xiaobin Yang	650/279-2957		1262 Water Lily Way, San Jose, CA 95129	20K	\$20,000.00	Jul-05	Declaration signed.

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Ming Yue Li			822 Millo Ct., San Jose, CA 95133	20K	\$20,000.00	Aug-05	Declaration signed.
Zai Sheng, Zheng	415-240-2786		3045 Catalina Island Rd., West Sacramento, CA 95691	\$30K	\$30,000.00	Jan-03	A/C#F8206
Mariya Mori Smith	415-928-8752	415-987-8072	1215 Greenwich St. #4-c, SF, CA 94109	\$95K	\$93,343.29	Aug-06	Withdrew closing balance of \$1,656.71. A/C#F8182
Greg Lai Dea/Joanne Sidi/Jan Qing Guan		415-354-6673	53 Yale Street, SF, CA 94134	\$25K, Withdrew \$5500 & closed out \$1700	\$17,800.00	Jul-04	A/C#F8346
Sally Cheung Kwong	415-333-9349						
Beetha Chin/Eva Choi	415-285-6983	415-412-8673	2781 Bryant Street, SF, CA 94110	\$20K		May-03	Paid cash of \$20K and got back \$1,000.00. No records of investment
Jason Huang	415-566-1465	415-517-7618	2312 21st Ave. SF, CA 94116	\$42,300.00	\$42,300.00	May-03	A/C#F8228
Yong Sheng	510-276-8726	650-872-3268	16114 Via Arriba, San Lorenzo, CA 94580	\$22K, Withdrew \$3,089.28	\$18,940.72	Jan-05	A/C#F8404
Had Ming, Lu	415-830-1932		530 Larkin St. #305B, SF, CA 94102	\$30K	\$29,892.03	Apr-05	Withdrew closing balance of \$107.97. A/C#F8439
Lei/in, Li	415-337-7688	408-310-3669	1166 Munich St. S.F. CA 94112	\$20K	\$20,000.00	Jan-04	A/C#F8300.
Li Chen, Xiao	415-602-6960	415-640-7376	318 Argonaut Ave. S.F. CA 94134	\$10K		Oct-04	Complainant did not keep any receipt for the investment
Xiang Li, Xu		415-623-9729	30 Edgar Pl. S.F. CA 94112	\$20K, withdrew \$4,733.22	\$15,266.78	Sep-04	A/C#F8366
Bonnie Bickhar Tang	415-586-6582	415-362-5500	48 Saint Charles Ave. S.F. CA 94132	\$24K	\$24,000.00	Apr-06	A/C#F8430
Xiao Qin, Rong	415-693-9872	415-987-8230	1314 30th. Ave. S.F. CA 94122	\$30K	\$19,863.42	Aug-02	A/C#8186, only have support for \$20K, closing balance \$136.58
Samuel Choy	415-203-5421	415-986-0832	828 J Pacific Ave. S.F. CA 94133	\$20K	\$20,000.00	Sep-04	A/C#F8360, deposit records only.
Jin Zhu Wang	415-334-3288	415-860-1680	75 Byxbee Street, SF, CA 94132	\$20K, withdrew \$1194.23	\$18,805.77	Oct-04	A/C#F8384
Hong Li	415-812-5037		1636 48th Ave. S.F. CA 94122	\$31,729.00	\$31,729.00	Oct-06	A/C#F8266
Yida, Li	415-379-9497	415-992-2731	883 37th. Ave. S.F. CA 94121	\$12,000.00	\$8,624.62	Jun-06	Withdrew closing balance of \$3375.38. A/C#F8239
Yue Lan, Li	408-436-1098	510-755-5331	1266 Mayberry Ln, San Jose, CA 95131	\$40K, Withdrew closing bal. \$975.83	\$39,024.17	Mar-05	A/C#F8412, the additional \$20K was supported by statement balance & cancelled check.
Nicole Rui Feng, Wu	408-436-1098	605-255-3088	1266 Mayberry Ln, San Jose, CA 95131	\$20K, withdrew \$2122.39	\$17,877.61	Apr-05	A/C#F8437
	415-570-3480		315 Lakeview Ave. S.F. CA 94112	\$14K, \$200 cash back		Jun-03	Investor did not maintain any documents. She stated that she paid cash to the agent Gary Luo

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Sharon Peng	415-641-1211	510-525-4746	1851 Palou Ave. S.F. CA 94124	\$30,000.00	\$30,000.00	May-05	A/C#F8447
Jin Wei, amanda Hu & Manshui Chan	415-750-1340	415-439-3248	457 43rd Ave. S.F. CA 94121	\$97,300.00	\$95,200.00	May-05	For A/C#F8426 & A/C#F8444
Zhi Hong Guo	415-676-1943		58 Lighthouse, Daly City, CA 94014	\$15,000.00	\$15,000.00	Nov-02	A/C#F8205
Yang Wong	415-665-9061	415-608-6071	1574 42nd Ave. S.F. CA 94122	\$50K	\$50,000.00	Jun-06	A/C#F8246
Janet Huixian Wu	415-202-4113		1658 42nd Ave. S.F. CA 94122	\$26,500	\$26,500.00	May-03	A/C#F8229
Yao Ping Yee/Lew	415-668-9841		718 7th Ave. S.F. CA 94118	\$47,000	\$47,000.00	Apr-03	A/C#F8222
Justin Zhu	415-392-3938	415-812-6123	63 Huntington Dr. S.F. CA 94132	\$34,000	\$34,000.00	Apr-02	A/C#F8150
Yvonne Yang	415-543-1832		133 Shipley Street, Apt. W306, S.F. CA 94107	\$10,000	\$10,000.00	Aug-02	A/C#F8180.
Jie Liang	510-653-4284	510-869-3169	196 Santa Clara Ave. Oakland, CA 94610	\$20,000	\$20,000.00	Sep-04	A/C#F8379
Chris Burton	704-453-1778	704-896-0339	20306 N. Main St. Cornelius, NC 28031	\$45,000	\$45,000.00	Nov-03	A/C#F8270
James Weizhong Zhao		510-813-8397	1126 South Van Ness Ave. Apt. 3, S.F. CA 94110	\$46,495	\$25,000.00	Jun-01	A/C#F8106 & F8112. Per James, all fund in the F8106 were transferred to F8112. He did not include all statements to reflect all withdrawals from the accounts. He stated that the loss was about \$25K.
Salvo Xiaobin Liu	415-309-8682	415-309-8682	1954 Donner Ave. S.F, CA 94124	46,448.00	\$37,170.00	Apr-03	Documents complete. A/C#F8226.
Joan Chun Yu	510-594-7154		841 Stockton Street, #3 S.F. CA 94108	120,000.00	\$95,000.00	Oct-05	Please review Declaration for detail. Added on 4/9/2008
Ran Shao Wei	415/602-9617	415/205-0501	2359 20th Ave. S.F. CA.94116	\$20K	\$20,000.00	3/05 to 7/05	
Fang/Jian Zhen							
Yan Ling Wong	415-391-8362		517 Union Street San Francisco, CA 94133	\$30,000.00	\$30,000.00	Mar-07	A/C#H9069, filed police report
Rui Yi, Guan	415-359-3035		1461 Powell Street, #1 San Francisco, CA 94133	\$80,000.00	\$80,000.00	Feb-07	A/C#H9068, filed police report
Mei Ling, Wu	415-608-6719		828 Grant Avenue #204 San Francisco, CA 94108	\$68,000.00	\$68,000.00	5/28/2006	A/C#F8486, filed police report
Mei Ci, Li	415-999-4021		231 15th Ave. San Francisco, CA 94118	\$61,000.00	\$61,000.00	3/14/2006	A/C#F8482, filed police report
Jingyi Jen/Bay Area Affordable Housing	650-638-2370		1635 Taraval St. San Francisco, CA 94116	\$93,500.00	\$93,500.00	Jan 04-Dec 06	Represented by Cooke Kobrick & Wu LLP
Mei-Fang Lisa, Zhang	650-638-2370		1061 Sycamore Dr. Millbrae, CA 94030	\$118,990.00	\$118,990.00	Jan 04-Nov 06	Represented by Cooke Kobrick & Wu LLP

NICI Investor Claimant List

Consumer	Home Phone Number	Business Phone Number	Mailing Address	Amount Invested	Amount Loss	Investment Dates	Comments
Yang-Chun Zhang	650-638-2370		1061 Sycamore Dr. Milbrae, CA 94030	\$19,700.00	\$19,700.00	Mar-06	Represented by Cooke Kobrick & Wu LLP
Carol Deng	650-638-2370		519 Union St. San Francisco, CA 94133	\$21,500.00	\$21,500.00	Dec. 2006	Represented by Cooke Kobrick & Wu LLP
Han Liang	650-638-2370		411 Tilton Ave. San Mateo, CA 94401	\$37,159.00	\$37,159.00	Sep 06-Mar 07	Represented by Cooke Kobrick & Wu LLP
Xuehuan Gao	650-638-2370		1323A 15th Ave. San Francisco, CA 94122	\$40,000.00	\$40,000.00	Oct-06	Represented by Cooke Kobrick & Wu LLP

Total Investment Losses \$3,072,784.74

NICI Investors Distribution Schedule

Page 1

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Ling, Shi Jing	\$32,000.00	1.04140%	\$272,496.95	\$2,837.78
Huang, David (Zhuo Cheng Huang)	\$22,901.00	0.74528%	\$272,496.95	\$2,030.88
Ramos, Renee	\$74,430.00	2.42223%	\$272,496.95	\$6,600.51
Liu, Yuling	\$10,597.00	0.34487%	\$272,496.95	\$939.75
FENG, GUO QIANG	\$24,000.00	0.78105%	\$272,496.95	\$2,128.34
Wan Jun Zhao	\$50,000.00	1.62719%	\$272,496.95	\$4,434.04
Benjamin Bao Shan Yang (needs translator)	\$10,500.00	0.34171%	\$272,496.95	\$931.15
Xiao Yuan Guo (Wei Tan)	\$61,050.00	1.98680%	\$272,496.95	\$5,413.96
Huang, Lin (Husb Wilson Zi Chang Wu) needs translator	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62

NICI Investors Distribution Schedule

Page 2

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Wang, Xiang	\$18,800.00	0.61182%	\$272,496.95	\$1,667.20
Chen, Nan Hai	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Zhen, Jian	\$0.00	0.00000%	\$272,496.95	\$0.00
Mei, Wenzhen	\$25,300.00	0.82336%	\$272,496.95	\$2,243.62
Zhu, Zhi Yuan	\$42,000.00	1.36684%	\$272,496.95	\$3,724.59
Lee, Derrick		0.00000%	\$272,496.95	\$0.00
Duan, Nicolas	\$70,467.00	2.29326%	\$272,496.95	\$6,249.07
Luo, Hua Jie	\$56,000.00	1.82245%	\$272,496.95	\$4,966.12
Huang, Jeff Zhuofan	\$40,000.00	1.30175%	\$272,496.95	\$3,547.23
Huang, Su Ling	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Chu, David Chaowei	\$37,000.00	1.20412%	\$272,496.95	\$3,281.19
Sun, Xiaodong	\$29,000.00	0.94377%	\$272,496.95	\$2,571.74
Zhao Lian Jian	\$53,081.00	1.72746%	\$272,496.95	\$4,707.26
Lay Bing Loo (needs translator)	\$14,395.03	0.46847%	\$272,496.95	\$1,276.56
Xiao Ping Hu (and mother Ying Hu)	\$24,000.00	0.78105%	\$272,496.95	\$2,128.34
Xiaoli Feng	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62

NICI Investors Distribution Schedule

Page 3

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Weng Si Kou	\$24,912.69	0.81075%	\$272,496.95	\$2,209.28
Kong W. Shiu		0.00000%	\$272,496.95	\$0.00
Wen Ouyang	\$17,000.00	0.55324%	\$272,496.95	\$1,507.57
Julie Qinglian Zhang	\$60,490.49	1.96859%	\$272,496.95	\$5,364.34
Carl E. Gill	\$18,015.41	0.58629%	\$272,496.95	\$1,597.62
Cindy Liu Zheng	\$18,000.00	0.58579%	\$272,496.95	\$1,596.25
Jin Honk Zhao	\$23,000.00	0.74851%	\$272,496.95	\$2,039.66
Shao Fu Guan	\$9,616.00	0.31294%	\$272,496.95	\$852.75
Jian Ning Cao	\$26,166.73	0.85156%	\$272,496.95	\$2,320.49
Yvonne Huang		0.00000%	\$272,496.95	\$0.00
Danny Choi		0.00000%	\$272,496.95	\$0.00
David Laursen	\$101,000.00	3.28692%	\$272,496.95	\$8,956.76

NICI Investors Distribution Schedule

Page 4

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Sophia Sun and David Jiang	\$40,000.00	1.30175%	\$272,496.95	\$3,547.23
Kitty Chang (poor English)	\$15,501.00	0.50446%	\$272,496.95	\$1,374.64
Helena Yeehar Lee (poor English)	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Santos Rehmkne	\$13,000.00	0.42307%	\$272,496.95	\$1,152.85
Sylvia Obradovic	\$30,000.00	0.97631%	\$272,496.95	\$2,660.42
Steven Ting	\$19,500.00	0.63460%	\$272,496.95	\$1,729.28
Hongyu Christina Liang	\$28,000.00	0.91123%	\$272,496.95	\$2,483.06
Tsz Ho Lai (Danny)	\$15,500.00	0.50443%	\$272,496.95	\$1,374.55
Mei Chin Sheng	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Lapway Chang	\$90,374.98	2.94114%	\$272,496.95	\$8,014.52
Lenore Lau	\$100,000.00	3.25438%	\$272,496.95	\$8,868.08
		0.00000%	\$272,496.95	\$0.00
Xiaobin Yang	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Ming Yue Li	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Zhi Sheng, Zheng	\$30,000.00	0.97631%	\$272,496.95	\$2,660.42
Masayo Mori Smith	\$93,343.29	3.03774%	\$272,496.95	\$8,277.76
Gum Lai Dea/Joanne Sit/Jin Qing Guan	\$17,800.00	0.57928%	\$272,496.95	\$1,578.52

NICI Investors Distribution Schedule

Page 5

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Sally Cheung Kwong		0.000000%	\$272,496.95	\$0.00
Bertha Chin/Eva Choi	\$42,300.00	1.37660%	\$272,496.95	\$3,751.20
Jason Huang	\$18,940.72	0.61640%	\$272,496.95	\$1,679.68
Yong Sheng	\$29,892.03	0.97280%	\$272,496.95	\$2,650.85
Hao Ming, Lu	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Lei Yin, Li		0.00000%	\$272,496.95	\$0.00
Li Zhen, Xiao	\$15,266.78	0.49684%	\$272,496.95	\$1,353.87
Xiang Li, Xu	\$24,000.00	0.78105%	\$272,496.95	\$2,128.34
Bonnie Bickbar Tang	\$19,863.42	0.64643%	\$272,496.95	\$1,761.50
Xiao Qin, Rong	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Samuel Choy	\$18,805.77	0.61201%	\$272,496.95	\$1,667.71
Jim Zhu Wang	\$31,729.00	1.03258%	\$272,496.95	\$2,813.75
Hong Li	\$8,624.62	0.28068%	\$272,496.95	\$764.84
Yuan, Li	\$39,024.17	1.26999%	\$272,496.95	\$3,460.69
Yue Lan, Li	\$17,877.61	0.58180%	\$272,496.95	\$1,585.40
Nicole Rui Feng, Wu		0.00000%	\$272,496.95	\$0.00
Sharon Peng	\$30,000.00	0.97631%	\$272,496.95	\$2,660.42
Jun Wei, amanda Hu & Manshui Chan	\$95,200.00	3.09817%	\$272,496.95	\$8,442.41
Zhi Hong Guo	\$15,000.00	0.48816%	\$272,496.95	\$1,330.21
Yang Wong	\$50,000.00	1.62719%	\$272,496.95	\$4,434.04
Janet Huixian Wu Louie	\$26,500.00	0.86241%	\$272,496.95	\$2,350.04
Yuk Ping Yee/Lew	\$47,000.00	1.52956%	\$272,496.95	\$4,168.00

NICI Investors Distribution Schedule

Page 6

Investors	Amount of Losses	% of loss to total loss	Funds available for distribution	Amount to be distributed
Juan Zhu	\$34,000.00	1.10649%	\$272,496.95	\$3,015.15
Yvonne Yang	\$10,000.00	0.32544%	\$272,496.95	\$886.81
Jie Liang	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Chris Burton	\$45,000.00	1.46447%	\$272,496.95	\$3,990.64
James Weizhong Zhao	\$25,000.00	0.81359%	\$272,496.95	\$2,217.02
Sally Xiaobin Liu	\$37,170.00	1.20965%	\$272,496.95	\$3,296.26
Joan Chun Yu	\$95,000.00	3.09166%	\$272,496.95	\$8,424.67
Ray Shao Wei Fang/Jian Zhen	\$20,000.00	0.65088%	\$272,496.95	\$1,773.62
Yan Ling, Wong	\$30,000.00	0.97631%	\$272,496.95	\$2,660.42
Rui Yi, Guan	\$80,000.00	2.60350%	\$272,496.95	\$7,094.46
Mei Ling, Wu	\$68,000.00	2.21298%	\$272,496.95	\$6,030.29
Mei Ci, Li	\$61,000.00	1.98517%	\$272,496.95	\$5,409.53
Jimmy Jen/Bay Area Affordable Housing	\$93,500.00	3.04284%	\$272,496.95	\$8,291.65
Mei-Fang Lisa, Zhang	\$118,990.00	3.87238%	\$272,496.95	\$10,552.13
Yang-Chun Zhang	\$19,700.00	0.64111%	\$272,496.95	\$1,747.01
Carol Deng	\$21,500.00	0.69969%	\$272,496.95	\$1,906.64
Hao Liang	\$37,159.00	1.20929%	\$272,496.95	\$3,295.29
Xue Huan, Gao	\$40,000.00	1.30175%	\$272,496.95	\$3,547.23
Total	\$3,072,784.74	100.00000%		\$272,496.95